

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

**NANCY I. CLINE, et al.**

**Plaintiffs**

**v.**

**Case No. JFM-03-CV-529**

**AGAPE HARVESTER CHURCH, INC., et al.**

**Defendants**

**JOINT QUESTIONS TO PROSPECTIVE JURORS ON VOIR DIRE**

**1. Do any members of the jury panel or any members of their respective families know or are they related in any way to any of the parties in this case?**

**NANCY J. CLINE of Bay City, Michigan, JOSH CLINE of Bay City, Michigan, TERRY MARIE TUNNEY of Alger, Michigan, DOROTHY ANN MILLER of Prescott, Michigan, BRIAN CLINE of Prescott, Michigan, RICK DAVID CLINE of Lupton, Michigan, AGAPE HARVESTER CHURCH, INC. a Florida corporation doing business in Hagerstown, MD and JOHN JAMES CHRISTY.**

**2. Do any members of the jury panel or any members of their respective immediate families know, have any social or business relationship or have they ever been represented by any counsel in this case?**

**LEONARD A. ORMAN, TIM FREEL, ELLIOTT LEWIS, LARRY BALLANTINE**

**3. Do any members of the jury panel or any member of their respective immediate families know or have any social, professional or business relationships with Maryland State Troopers Corporal B.L. Townes, TFC Robert Fraley, both of MD State Police, Hagerstown Barracks; Gregory Manning, an accident**

reconstructionist, Thomas Bowers, an accident reconstructionist, John E. Herco, 11915 South Street, P.O. Box 302, Libertytown, MD 21724, John Eric Herko, 11915 South Street, Libertytown, MD 21762, Herman Miller of Silver Spring, MD, Dr. Edwin Pitto, Medical Examiner for Washington County, J. Laron Locke, M.D. and Jacqueline L. Paral, M.D. State Medical Examiner's Office

4. Have any juror or member of his or her family been employed by or as an investigator of any kind including accident investigation and accident reconstruction.?

5.. Has any member of the jury panel or any members of their immediate family studied law or been a student at a law school?

6. Have any of you ever worked as a casualty investigator, or claims adjuster?

7. Has any members of the jury seen advertisements by liability insurance companies in Time magazine, the Wall Street Journal, or the Smithsonian Institute or any other publications including the internet in regards to jury verdicts?

8. Does any member of this jury panel feel that he or she would be prejudiced one way or another by reason of anything you have read, or any experience you may have had which would prevent you from doing justice to either side in a law suit for damages by an individual injured or killed in an automobile accident?

9. Has any member of the jury read any articles or literature, or heard any discussion on jury verdicts? If so, would this have any effect on the amount of the

**verdict which you would award in the event you find a verdict in favor of the Plaintiffs?**

**10. Does any member of the jury hold the belief that the death of an individual, because of someone else's negligence, should not be compensated for in money damages?**

**11. Does any member of the jury panel have any family member or close personal friend who has been killed in a motor vehicle accident? If so, would that fact prevent you from rendering a fair and impartial verdict in this case?**

**12. Is there anything in your religious or moral belief that causes you to hold that a person should not sue another or should compromise their case rather than submit it to a jury?**

**13. Does any member of the jury have any objection to awarding damages in a lawsuit which asks for money for pain and suffering for personal injuries and death received in an automobile collision?**

**14. Has any member of this jury panel or members of their immediate family been involved in a personal injury accident whereby a claim has been made for or against you for such personal injuries or death or has any member of the jury panel or members of their immediate family made a claim for compensation for injury of any kind?**

**15. Has any member of this jury panel ever been employed as a nurse, nursing assistant or in any other field dealing with persons who have sustained personal injuries?**

16. Does any member of this jury panel have any objections to or feeling against any person who sues for personal injuries or death sustained as the result of an automobile collision?

17 Is there any member of the jury panel who feels for one reason or another that he or she cannot sit on this jury and render a fair and impartial verdict according to the law and the evidence.

\_\_\_\_\_/s/\_\_\_\_\_  
Leonard A. Orman, P.A.  
26 South Street  
Baltimore, MD 21202  
410-962-0400

\_\_\_\_\_/s/\_\_\_\_\_  
Timothy Freel  
Elliott N. Lewis  
1 E. Lexington Street  
Baltimore, MD 21201

\_\_\_\_\_  
Lawrence E. Ballantine  
1 West Pennsylvania Avenue  
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